



United States Attorney
Southern District of New York

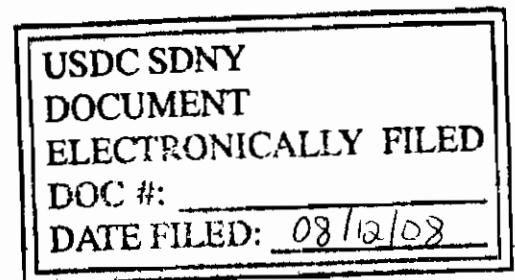
The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

MEMO ENDORSED

July 18, 2008

BY HAND

Honorable Charles S. Haight, Jr.
United States District Judge
United States Courthouse
500 Pearl Street
New York, New York 10007



Re: United States v. Lloyds TSB Bank plc,
07 Civ. 9235 (CSH)

Dear Judge Haight:

We respectfully submit this letter in support of the Government's application to file a sur-reply to the Defendant Lloyds TSB Bank plc's ("Lloyds") Motion to Dismiss the Plaintiff's Complaint.

As the Court is aware, on October 15, 2007, the Government filed the Complaint against Lloyds in the above-captioned action, seeking a civil monetary penalty of at least \$130,000,000. The Complaint alleged, among other things, that Lloyds conspired with the principals of AremisSoft to launder the proceeds of a massive securities fraud.

On January 25, 2008, Lloyds filed a Motion to Dismiss the Complaint with an accompanying Memorandum of Law and other materials. On April 23, 2008, the Government filed its Memorandum in Opposition to Lloyds's Motion to Dismiss. On June 20, 2008, Lloyds filed its Reply Memorandum in Further Support of its Motion to Dismiss, along with two new declarations.


In its Reply Memorandum, Lloyds misstates the applicable law and alleged facts concerning two discrete issues: (a) the application of the statute of limitations to claims stated in the Complaint and (b) Lloyd's consent to personal jurisdiction. The Government requests an opportunity to address Lloyds's arguments made in its Reply Memorandum regarding these narrow topics. A sur-reply memorandum would permit the Government to address case law and factual arguments raised for the first time in Lloyds's Reply Memorandum and would streamline oral argument on this motion, which might otherwise be mired in discussions of facts and case law that the Government has not yet had an opportunity to address.

The Honorable Charles S. Haight, Jr.
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The Government does not seek to use the requested sur-reply to respond to Lloyds's other arguments made in its reply brief. These other arguments, which take up the majority of the Lloyd's briefs, can be adequately addressed at oral argument on this motion. The Government, accordingly, requests oral argument on Lloyds's Motion to Dismiss.

Respectfully submitted,

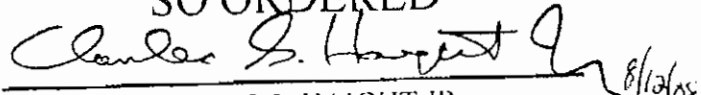
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Plaintiff's application for leave to file and serve a sur-reply brief is granted. The proposed sur-reply brief enclosed with plaintiff's letter of request will be filed and considered by the Court. The defendant Banks may file and serve a response to this sur-reply brief on or before August 27, 2008.

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SO ORDERED

CHARLES S. HAIGHT JR.
SENIOR UNITED STATES DISTRICT JUDGE 8/12/08